

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION.

STEPHON LINDSAY, #207044,

Plaintiff,

V.

RICHARD ALLEN, et al.,

Defendants.

20 SEP 17 A 9:46
DEPT. P. HACKETT
DISTRICT COURT
MOBILE DISTRICT ALA
[WC]

PLAINTIFF'S FIRST INTERROGATORIES
TO MEDICAL DEFENDANT DR. TAHIR SIDDIQ

Pursuant to Rule 26 and Rule 33 of the Federal Rules of Civil Procedure, Plaintiff requests that Medical Defendant Dr. Tahir Siddiq answer the following interrogatories:

1. Please identify all positions and titles, with corresponding dates of employment, that you have held for Prison Health Services, Inc., that are relevant to your duties at Bullock County Correctional Facility.
2. Please describe your job responsibilities for each position and title listed in your response to Interrogatory #1.
3. Please identify all Prison Health Services, Inc. staff members who were on duty in the Bullock County Correctional Facility Health Care Unit between 2:00 p.m. and 6 p.m. on January 8, 2007 (by name, title, position held at that time, and work address).
4. Please identify what your normal duty hours are at the Bullock County Correctional Facility Health Care Unit.
5. Please describe in as much detail as possible the training you received through the Alabama Department of Corrections that is relevant to you being allowed to enter Bullock County Correctional Facility, an Alabama Department of Corrections facility.

6. Please describe in as much detail as possible every policy, procedure, and practice that governs the health care you provide inmates at Bullock County Correctional Facility that have a serious medical need.
7. Please describe in as much detail as possible every policy, procedure, and practice that governs the health care service you provided to Inmate Stephon Lindsay, AIS #207044, on January 8th, 2007.
8. Please identify all your official responsibilities for formulating, implementing, and monitoring compliance with the policies, procedures, and practices that govern health care provided to inmates at Bullock County Correctional Facility.
9. Please describe in as much detail as possible your official responsibilities that govern your supervisory duties for Prison Health Services, Inc. at Bullock County Correctional Facility for ensuring subordinates are providing adequate medical health care services to inmates at Bullock County Correctional Facility.
10. Please identify each person known to you and not otherwise identified in your answers to Interrogatories #1 - 9 who provided health care service to Inmate Stephon Lindsay, AIS #207044, between January 8, 2007 and March 1, 2007.
11. Please identify by name and position each person who has made sworn or unsworn statements to you or provided information for affidavits or statements to you that relate to the allegations made in Inmate Stephon Lindsay's §1983 Complaint and state the information provided.
12. Please identify by name and position each person employed in a medical field at Bullock County Correctional Facility Health Care Unit who has reported to you witnessing any inmate being struck, hit, kicked, punched, or otherwise physically accosted by a Correctional Officer of any rank while in the Health Care Unit of Bullock County Correctional Facility at any date between January 1, 2007 and March 1, 2007.
13. Please identify by name any medical practices, facilities, or agencies that you are affiliated with or a part of, or earn income from, that have any association with any individual(s) that are employed by the Alabama Department of Corrections at Bullock County Correctional Facility.

Respectfully submitted on this 10th day of September, 2007.

Stephon Lindsay 207044
Stephon Lindsay, Plaintiff, pro se
AIS #207044, Dorm E4
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Ventress Correctional Facility
P.O. Box 767
Clayton, AL 36016-0767

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing filing on the parties listed below by placing a true copy in the U.S. Mail, postage prepaid, to the following addresses on this 10th day of September, 2007.

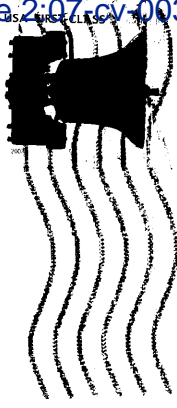
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Stephon Lindsay 207044
Stephon Lindsay, Plaintiff, pro se

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United States District Court
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